

IN THE INCOME TAX APPELLATE TRIBUNAL

“A” BENCH : BANGALORE

BEFORE SHRI CHANDRA POOJARI, ACCOUNTANT MEMBER AND
SHRI PAVAN KUMAR GADALE, JUDICIAL MEMBER

IT(TP)A No. 1831/Bang/2016
Assessment Year : 2012-13

M/s. ANZ Support Services India Private Limited, “Eucalyptus”, Manyata Embassy Business Park – SEZ, Outer Ring Road, Nagavara & Rachenahalli Village, K.R. Puram Hobli, Bangalore – 560 045. PAN: AAGCA5549M	vs.	The Deputy Commissioner of Income Tax, Circle – 1 (1) (2), Bangalore.
APPELLANT		RESPONDENT

Appellant by	:	Shri Chavali Narayan, CA
Respondent by	:	Shri C.H. Sundar Rao, CIT (DR)

Date of hearing	:	28.01.2019
Date of Pronouncement	:	28.01.2019

ORDER

Per Shri Chandra Poojari, Accountant Member

This appeal by assessee is directed against the final assessment order passed by the AO dated 29.08.2016 u/s. 143(3) r.w.s. 144C(13) of the IT Act, 1961 in consequence to the directions of the DRP u/s. 144C(5) of IT Act dated 29.06.2016.

2. At the time of hearing, AR submitted that assessee has entered into a Bilateral Advanced Pricing Agreement (“BAPA”) with the Central Board of Direct Taxes (“CBDT”) on 31.08.2018. The agreement is applicable to consecutive five years commencing from Previous Year 2015-16 to Previous Year 2019-20 (relevant to Assessment Years 2016-17 to 2020-21). Further the Agreement is

also applicable to consecutive four rollback years commencing from Previous Year 2011-12 to Previous Year 2014-15 (relevant to Assessment Years 2012-13 to 2015-16) for international transactions entered with the Associated Enterprises ("AEs"). Since the issues involved in this appeal are covered under the BAPA, the assessee sought permission to withdraw this appeal. Considering the request of Id. AR, we are inclined to dismiss the appeal of the assessee as not pressed. Hence the appeal of the assessee is dismissed as withdrawn.

3. In the result, the appeal filed by the assessee is dismissed.

Order pronounced in the open court on the date mentioned on the caption page.

Sd/-
(PAVAN KUMAR GADALE)
Judicial Member

Sd/-
(CHANDRA POOJARI)
Accountant Member

Bangalore,
Dated, the 28th January, 2019.
/MS/

Copy to:
1. Appellant
2. Respondent
3. CIT

4. CIT(A)
5. DR, ITAT, Bangalore
6. Guard file

By order

Assistant Registrar,
Income Tax Appellate Tribunal,
Bangalore.